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6 Attorneys for Defendants  
7 ROCKLIN U.S.D., PLACER COUNTY SELPA, KRISTI GREGERSEN,  
TROY TICKLE, KRISTAIN ROYER & BETH DAVIDSON  
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10 THE UNITED STATES DISTRICT COURT  
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12 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

13 Louie Andres MARQUES, Gloria V.M., ) **Case No. 2:22-CV-00150-TLN-KJN**  
14 Thomas V.M., and Jordan V.M., )  
Plaintiffs, ) **STIPULATION REGARDING FURTHER  
vs. ) EXTENSION OF DEFENDANTS' TIME  
15 ) TO RESPOND TO THE SECOND  
16 ) AMENDED COMPLAINT; ORDER  
17 )  
18 GUIDING HANDS SCHOOL, Inc., et al., )  
Defendants, )  
19 )  
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21 Plaintiffs Gloria V.M., Thomas V.M., and Jordan V.M., and Defendants, ROCKLIN  
22 UNIFIED SCHOOL DISTRICT, PLACER COUNTY SELPA, KRISTI GREGERSEN, TROY  
23 TICKLE, KRISTAIN ROYER, and BETH DAVIDSON, by and through their attorneys of  
24 record, pursuant to Fed. R. Civ. P. 6 and 83 and Local Rules 143 and 144, hereby stipulate as  
25 follows: These Defendants may have a further extension of time to respond to the Plaintiffs'  
26 Second Amended Complaint, as set forth below.

27 Good cause exists for the requested relief, as follows:  
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1       On February 14, 2022, this court entered an order (Dkt. 10), pursuant to the parties'  
2 stipulation, granting defendants ROCKLIN UNIFIED SCHOOL DISTRICT, PLACER  
3 COUNTY SELPA, KRISTI GREGERSEN, TROY TICKLE, KRISTAIN ROYER and BETH  
4 DAVIDSON an extension of time to file their response to the Second Amended Complaint  
5 (SAC) up to and including March 15, 2022.

6       This case is related to Eastern District of California Case No. 2:20-cv-00635-TLN-KJN  
7 (ANGLEY, et al. v. GUIDING HANDS SCHOOL, INC. et al.), in that the plaintiffs have  
8 asserted claims against defendants GUIDING HANDS SCHOOL, INC. and POINT QUEST,  
9 INC., and their former employees, based on the alleged unlawful use of physical restraints upon  
10 the plaintiffs, who were minor students enrolled at one or both schools. A NOTICE of  
11 RELATED CASES was filed in the ANGLEY action on January 26, 2022 (Dkt. 224) relating  
12 the ANGLEY action to this action, and the court signed a RELATED CASE ORDER on  
13 January 31, 2022 (Dkt. 227).

14      There is a pending criminal matter involving the GUIDING HANDS and POINT  
15 QUEST defendants related to the subject matter of these related cases. As a result, on March 1,  
16 2022, the court entered an order (Dkt. 234) granting the plaintiffs' Motion to Stay Case 2:20-cv-  
17 00635 (Dkt. 153).

18      On March 9, 2022, Plaintiffs' counsel herein informed defense counsel that within the  
19 next thirty days they intend to file a motion to consolidate this matter with the ANGLEY  
20 matter and that they also intend to move to stay this action pending resolution of the criminal  
21 matter. The parties agreed that under the circumstances, defendants' time to respond to the  
22 SAC should be extended, pending the court's ruling on the motion to consolidate and motion to  
23 stay.

24      Accordingly, the parties hereto stipulate that defendants ROCKLIN UNIFIED SCHOOL  
25 DISTRICT, PLACER COUNTY SELPA, KRISTI GREGERSEN, TROY TICKLE,  
26 KRISTAIN ROYER, and BETH DAVIDSON, should have a further extension of time to file  
27 their responsive pleading to the SAC, up to and including the thirtieth day following the court's  
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1 entry of an order on the plaintiffs' motion to consolidate and motion for a stay, whichever order  
2 is entered last.

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4 IT IS SO STIPULATED.  
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6 Dated: March 14, 2022

LAW OFFICES OF SETH L. GOLDSTEIN

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9 By \_\_\_\_\_ /s/  
10 SETH L. GOLDSTEIN,  
11 Lead Counsel for Plaintiffs,  
12 MARQUEZ, GLORIA V.M., THOMAS  
13 V.M. and JORDAN V.M.

14  
15 Dated: March 14, 2022

EVANS, WIECKOWSKI, WARD &  
16 SCOFFIELD, LLP

17  
18 By \_\_\_\_\_ /s/  
19 Carol A. Wieckowski  
20 Attorney for Defendants  
21 ROCKLIN U.S.D., PLACER COUNTY SELPA,  
22 KRISTI GREGERSEN, TROY TICKLE,  
23 KRISTAIN ROYER & BETH DAVIDSON

24  
25  
26 ORDER

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28 IT IS SO ORDERED.

Dated: March 15, 2022

  
Troy L. Nunley  
United States District Judge